Appln No. 09/575,129
Amdt. Dated May 12, 2006
Response to Office Action of March 17, 2006

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REMARKS/ARGUMENTS

The Applicant thanks the Examiner for the Office Action dated March 17, 2006.

Specification

Page 1 of the specification has been amended to correct a typographical error in the Co-Pending Applications. The Applicant submits that no new matter is introduced.

Response to Arguments – 35 USC § 103(a)

The Applicant contests the Examiner's assertion that Brown teaches printing coded data and visible information substantially simultaneously.

The Examiner makes reference to column 5, lines 40-43 of Brown, which states:

> *If the record has been altered or forged, the visible portion of the variable indicia will not match the normally invisible photoluminescent indicia which were <u>simultaneously printed</u> on the original record.*

However, it is important to understand exactly how Brown prints its variable indicia and photoluminescent indicia. This is explained unambiguously at column 6, lines 8-26 of Brown, and especially at column 6, lines 20-23:

> *The variable indicia may be printed on either side of the paper using a visible ink, dye or pigment <u>which includes a third marking agent having a third pre-determined and identifiable photoluminescent characteristic</u>.*

In other words, all Brown does is mix a photoluminescent dye with a standard visible ink to print visible and photoluminescent indicia simultaneously. The two indicia – visible and photoluminescent – are inevitably always identical and printed simultaneously.

By contrast, and as specified in the Applicant's claims, the present invention prints coded data (indicative of a surface identity and a plurality of reference points on the surface) and visible information (relating to the computer software) substantially simultaneously. Self-

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evidently, the coded data and the visible information cannot be identical in the present invention. Accordingly, Brown fails to teach printing coded data and visible information substantially simultaneously, because Brown's disclosure is inherently limited to the specific case where the invisible indicia and visible indicia are identical.

The Applicant submits that Brown does not make the present invention obvious, even when combined with the other cited prior art documents.

Claim Rejections - 35 USC § 112

Basis for the term "the invisible data and the visible information being printed substantially simultaneously" can be found in Sections 7.2.1 and 7.2.2 of the specification at pages 72-73, which describes generating a compressed page image and generating dot data for printing. Sections 7.2.1 and 7.2.2 make it clear that the page image and dot data contain CMYK+IR data for printing CMYK and IR channels at the same time (CMYK corresponds to visible information; IR corresponds to coded data).

The Examiner is particularly referred to the following passages at page 72, lines 20-23:

> *The infrared (IR) layer of the printed page contains coded netpage tags at a density of about six per inch. Each tag ... is generated during rasterization <u>and stored in the compressed page image</u>.*

and page 73, lines 17-20:

> <u>*The resultant bi-level CMYK+IR dot data is buffered and formatted (at 767) for printing on the Memjet ™ printhead 350*</u> *via a set of line buffers. Most of these line buffers are stored in the off-chip DRAM.* <u>*The final stage prints the six channels of bi-level dot data*</u> *(including fixative) to the Memjet ™ printhead 350 via the printhead interface 768.*
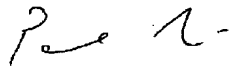
Hence, the specification provides explicit basis for the CMYK and IR dot data being received by a printhead at the same time. Of course, as is well known in the inkjet printing art, firing sequences of individual nozzles on the printhead determine precisely *when* a particular color channel is fired. As such, different color channels may not fire at precisely

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the same instant. Accordingly, the term "substantially simultaneously" (as opposed to plain "simultaneously") is used in the claims, since it more accurately reflects the operation of an inkjet printhead printing multiple color channels.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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